

# **BAKER DECLARATION**

## **EXHIBIT F**

1 UNITED STATES DISTRICT COURT  
2 WESTERN DISTRICT OF WASHINGTON  
3

4 STATE OF WASHINGTON, )  
5 PLAINTIFF, ) NO. 3:17-CV-05806-RJB  
6 VS. )  
7 THE GEO GROUP, INC., )  
8 DEFENDANT. )  
9 )  
10 )  
11

12 DEPOSITION UPON ORAL EXAMINATION OF  
13 BERTHA HENDERSON  
14

15 10:08 A.M.

16 JANUARY 30, 2019

17 800 FIFTH AVENUE, SUITE 2000

18 SEATTLE, WASHINGTON  
19



24 REPORTED BY: BETSY E. DECATER, RPR, CCR 3109  
25



A P P E A R A N C E S

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1 we necessarily have already gotten, so.

2 MR. PUSATERI: I'll ask. And, in candor, I don't  
3 know. So, you know, maybe at the end of our time this  
4 week, you know, you can memorialize all of these items  
5 and we'll go from there if that makes the most sense.

6 MS. BRENNEKE: All right. Thank you.

7 Q. (BY MS. BRENNEKE) All right. So let's go into  
8 you and your background and then your work with GEO.

9 So, first of all, would you sketch for me your  
10 personal background, your education and your work  
11 history up to the point where you started working for  
12 GEO?

13 A. I went to technical college after I graduated,  
14 graduated from Clover Park Technical College. Got my  
15 degree in food service. Worked in nursing homes, the  
16 military as a contractor, behavioral health facilities.  
17 So I've been in food service for about 37 years, and  
18 then in 2007 I went on to GEO.

19 Q. So all the positions you held for those 37 years  
20 were in food service in these different locations?

21 A. That's correct.

22 Q. And when did you graduate with your degree from  
23 Clover Park Technical?

24 A. '89.

25 Q. So in 2007, can you -- you were hired by GEO.



1 Will you sketch your -- what positions you held  
2 if they are any different from that point to the  
3 present?

4 A. I started with GEO as the food service assistant  
5 manager, and I maintained that position for about four  
6 -- four months, and then I moved to the manager's  
7 position.

8 Q. So when did you become food service manager?

9 A. About June of 2007.

10 Q. Have you held that position consistently since  
11 then?

12 A. That's correct.

13 Q. And that's your current position?

14 A. Uh-huh, that's correct.

15 Q. Is there something like food service  
16 administrator, a different title?

17 A. Yes. It's a food service administrator.

18 Q. Okay. Is that the same as food service manager?

19 A. That's correct.

20 Q. Thank you. That clears up some confusion.

21 A. All right.

22 Q. So can you tell me who was it that hired you in  
23 the food service assistant manager position?

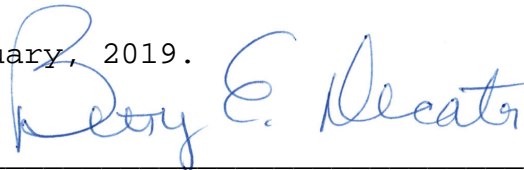
24 A. At that time it was the assistant warden, and I  
25 can't recall his name right now. But the warden at that



## REPORTER'S CERTIFICATE

I, BETSY E. DECATER, the undersigned Certified Court Reporter, pursuant to RCW 5.28.010 authorized to administer oaths and affirmations in and for the State of Washington, do hereby certify that the sworn testimony and/or proceedings, a transcript of which is attached, was given before me at the time and place stated therein; that any and/or all witness(es) were duly sworn to testify to the truth; that the sworn testimony and/or proceedings were by me stenographically recorded and transcribed under my supervision, to the best of my ability; that the foregoing transcript contains a full, true, and accurate record of all the sworn testimony and/or proceedings given and occurring at the time and place stated in the transcript; that a review of which was waived; that I am in no way related to any party to the matter, nor to any counsel, nor do I have any financial interest in the event of the cause.

WITNESS MY HAND and DIGITAL SIGNATURE this 11th day of February, 2019.



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